



WELCOMES & UPLANDS ROAD ASSOCIATION

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Georgina Betts
Case Officer
London Borough of Croydon
Bernard Weatherill House
8 Mint Walk,
CR0 1EA

Please reply to:
Richard Russell
Secretary
12 Zig Zag Road
Kenley CR8 5EL

17th January 2018

Re: application for planning permission 17/06240/FUL for a block of 7 x 2 bed flats at 57 Welcomes Road, Kenley CR8 5HA

Dear Ms Betts,

We refer to the above planning application and again must object to the construction of these flats.

Application No 16/05660/FUL dated 29th December 2016.

Demolition of existing dwelling, erection of 3 storey building comprising 3 two bedroom and 2 three bedroom flats with associated access and 5 parking spaces, incorporated bike and refusal (sic) store.

This was refused on the grounds of:

- 1) character of the area
- 2) sub-standard accommodation.

In the light of this decision it is hard to understand how 7 flats on the same footprint as the 5 flat development refused in December 2016, can be given outline planning permission in August 2017.

Inspector's response to appeal:

The Inspector concerned, Mr Roy Merret, visited the site on 23rd November 2016. On 4th January 2017 the appeal was dismissed but only on the grounds that the development would not be accessible and inclusive. Otherwise he did not find harm to the character and appearance of the area and seemed only to concern himself with the national policy to boost housing supply.

The Inspector appears to think this development is not harmful to the area despite over 100 local people disputing this along with the Croydon Council Planning Department Case Officer who had twice recommended refusal of planning permission for flats.

The rooflines of parked cars in the depictions and drawings provided by the applicant appear to be level when in practice they would all be tilted towards the road. The street scene on this basis would be distinctly odd and intrusive.

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Secretary	Richard Russell		12 Zig Zag Road	Kenley	CR8 5HA	Tel 020 8668 7293
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A multi occupancy building on this scale is not just out of keeping with the area but its bulk coupled with the re-orientation of the foot print mean that the flats will loom over the bungalow (No 60) opposite taking away their privacy and the enjoyment of their property.

Precedent:

The Inspector also dismissed the important point that the building of a block of flats in Welcomes Road would create a precedent on the basis that each application is assessed on its own merits. This is just not realistic or credible. There are other better sites to build flats along the road with the possibility of more adequate off-road parking.

If this occurs because of precedent it will lead to a permanent loss of green space and overwhelm Welcomes Road as a footpath leading up to the historic Kenley Airfield and the surrounding land held in trust for the public by the Corporation of London.

Parking and control of the road:

All that seems to be left to the Road Association now is to continue to raise the serious and very real problems of allowing a multi occupancy building on this inadequate site. Approval of this application also means that the legal right to the control and management of Welcomes Road, which is a private road, is effectively removed from the Road Association and its members who pay for the upkeep of the road from after tax income.

Is it reasonable to entirely ignore the recommendations of the Road Association and its members and to undermine the Association's right to maintain and manage parking in the road? *See extract from House of Commons paper attached.*

Our web site www.wura.org.uk sets out the parking standards laid down many years ago and the law relating to use of footpaths and highways. Until now the parking rules have by and large been observed by consent rather than active enforcement. The parking policy was formulated not simply because Welcomes Road is a footpath but because it averages only about 5 metres in width and has no pavement. It is also there to make sure residents can drive in and out of their own property without being impeded by a car parked on the footpath.

The stretch along the frontage of 57 WR is one of the narrowest parts of the road at just over 4 metres with a blind bend on the north boundary of the plot. It has always been necessary to control parking on the road to allow traffic, both wheeled and pedestrian, to move safely and unimpeded by unlawfully parked vehicles. The dangers to pedestrians cannot be over emphasized on what is in essence a poorly lit country lane.

Car park and trees: At the moment the planned car park on the south boundary is overhung by trees belonging to the neighbouring plot, No 59 Welcomes Road, and they will have to be cut back very severely to make room for the car park. 2

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The creation of the car park could damage the roots. Similarly on the north boundary the existing shrubs will have to be removed.

The analysis of the swept paths by autotrack is unconvincing and if anything it demonstrates that cars will not be able to manoeuvre easily especially if a vehicle is carelessly parked or oversized. Not all the parking spaces have been tested by autotrack. Auto track also shows the vehicle starting and end point on the road from an impossible position given that the road is only about a car length wide. Drivers will need to be physically able to get in and out of their cars when parked in the allocated space.

The lack of on site parking with nowhere legal to park in the road/footpath outside is unreasonable and unsustainable. The Mayor of London parking standards for outer London recommend greater flexibility in PTAL 0-1 areas. This site is too small to permit such flexibility.

The flats at 38 Hermitage Road (the site above and to the rear of 57WR) have garages, car park spaces, visitor spaces and plenty of room for delivery vans both on and off site. Hermitage road is an 8 metre road with a wide pavement. The setting for 38 Hermitage Road could not be more different to 57WR.

Fire risk:

Emergency vehicles must not be impeded on their way to an emergency. No one on the Council appears to have carried out a risk assessment of the development proposed and the access to them. The fire risk is considerably increased with 7 kitchens. An illegally parked vehicle also means that emergencies at other houses in the area may not be reached in time to prevent a tragedy.

Waste management:

Refuse collection will entail operatives pulling large 4 wheeled bins up and down a quite severe slope unless hundreds of tonnes of top soil is removed to flatten the area. There are foul drains crossing this site (which the owners of 57WR are covenanted to protect and maintain) and the developers/builders will be limited in what they can excavate by the presence of these drains.

The refuse collection lorry will have no option but to stay on Welcomes Road whilst the bins are moved to and fro between the bin store and the road.

According to the Council's own guidelines slopes should be avoided wherever possible along the pathway, but where needed the gradient should fall away from the bin storage area and should be no greater than 1:12.

The site at 57WR slopes up to the bin store from the road though it is not clear from the plans what the gradient will be but assuming the slope remains unchanged in line with the plans it is likely to be quite challenging to pull a 4 wheeled bin up and down whether full or empty.



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Detailed drawings of the flats in the roof space:

These do not seem to be available and most importantly the precise dimensions of the rooms and ceiling height. Much is made by the applicant of demonstrating that the roofline is the same as No 59 but without a full understanding of the ceiling heights of the roof flats the drawings are not convincing. Also the relative heights do not take into account the slope on Welcomes Road.

Construction logistics:

Should this application be permitted a lot of HGV traffic will be generated including no doubt a crane. The hardcore from demolishing the existing house coupled with bringing in and storing building materials and the parking of vehicles belonging to the workforce would be hugely disruptive. Welcomes Road is not built to sustain HGV traffic and the old cast iron gas pipe under the road is prone to fracturing.

Summary:

- The core reason for objecting to the building of 7 x 2 bed flats is that it is not on the spacious plot described by the Inspector. Because of the restricted plot the car park is simply too small even for 7 cars, one of which is a space for a disabled tenant the size of which is elastic in the applicants submissions.
- As the total floor area of the units has increased in the latest application the population of the flats could reach 20 and probably more.
- These numbers squeezed onto such a small plot, 1/3rd of which is steeply sloping, plus all the cars and waste which will accumulate is simply unsustainable and will have a severely negative impact on the street scene and the quality of life both of existing neighbours and the flat owners themselves.
- There is no storage for personal effects other than the bin and cycle stores.
- These will not be affordable flats due to the huge cost of the site/land, clearing it and the likely construction costs. The flats will not help solve the housing crisis for first time buyers.
- The proposed car park is too small to prevent the need for parking on the footpath. Welcomes Road is a designated footpath and parking on it, except for very brief periods or in an emergency, is an offence
- The potential numbers living in the flats will attract a disproportionate number of visits when there is very restricted on site parking for deliveries and none for other longer term visitors



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- Obstructing the highway will jeopardise the free movement of traffic including emergency vehicles
- Welcomes Road is only just over 4m wide outside 57 and has a blind bend to the north boundary
- Parked cars on the footpath unreasonably increase the dangers to other road users and prevent neighbours from driving in and out of their properties
- The management of waste is in conflict with the Council's own guidelines
- The likely population of the flats is too much for the small site and there will be loss of amenity for everyone
- The construction phase will cause excessive, and unreasonable annoyance for all users of the Highway/footpath and especially the immediate neighbours
- The road is not built to carry HGV traffic and the old cast iron gas pipe under the road is prone to leaks. On this basis alone there should be a moratorium on large construction projects until after the cast iron gas pipes have been replaced by Southern Gas Networks
- The granting of this application, which appears to be based on the assessment and opinion of a single unaccountable individual (the Inspector) in defiance of local opinion and the Croydon Council Case Officer, effectively removes the right to manage the maintenance of the road and parking on it from this Road Association. This surely cannot be right.

We urge that the application for full planning permission be refused on the grounds that a flatted development of the size and number proposed requiring access over a narrow footpath is unsustainable and unworkable and will do significant harm to the area and the roads surrounding it.

We would be happy to attend a site meeting with you if it would be of any help.

Yours sincerely,

Colin Brown
Chairman

Richard Russell
Secretary

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